

EXHIBIT B

From: [Arjun Vasani](#)
To: [Makitalo, Rebecca I.](#); [Winningham, Jacob R.](#); [Keech, Ryan Q.](#); [Chiu, Stacey G.](#)
Subject: protective order updated
Date: Monday, December 8, 2025 5:27:06 PM
Attachments: [protective-order-updated.docx](#)

This Message Is From an External Sender

This message came from outside your organization.

Attached.

Best,
Arjun Vasani

Makitalo, Rebecca I.

From: Makitalo, Rebecca I.
Sent: Monday, December 8, 2025 4:26 PM
To: Arjun Vasan
Cc: Keech, Ryan Q.; Chiu, Stacey G.; Winningham, Jacob R.
Subject: RE: Vasan v. Checkmate - Case No. 2:25-CV-00765-MEMF-AS

Mr. Vasan,

We circulated the Draft Stipulated Protective Order three days ago. If you intend to propose any revisions, Checkmate will need adequate time to review and, as necessary, prepare responsive edits.

As Judge Sagar's website makes clear, "Absent unusual circumstances, parties shall prepare their protective orders based on the model protective order." In that spirit, please promptly provide your draft in redline format so that we can evaluate any proposed deviations and keep this on track for timely filing by today.

Thank you,

Rebecca Makitalo
Associate
K&L Gates LLP
10100 Santa Monica Blvd
8th Floor
Los Angeles, CA 90067
Phone: 310 552-5502
Cell: 818 251-6956
rebecca.makitalo@klgates.com
www.klgates.com

From: Arjun Vasan <arjun.vasan@gmail.com>
Sent: Monday, December 8, 2025 4:15 PM
To: Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>
Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>; Winningham, Jacob R. <Jacob.Winningham@klgates.com>
Subject: Re: Vasan v. Checkmate - Case No. 2:25-CV-00765-MEMF-AS

This Message Is From an External Sender

This message came from outside your organization.

I am working on it, it may take a little time.

On Mon, Dec 8, 2025 at 1:13 PM Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com> wrote:

Mr. Vasan,

Following up on the Draft Stipulated Protective Order we previously circulated to you. Could you please let us know when we can expect to receive a revised draft from you?

Thank you,

Rebecca Makitalo

Associate

K&L Gates LLP
10100 Santa Monica Blvd

8th Floor

Los Angeles, CA 90067

Phone: 310 552-5502

Cell: 818 251-6956

rebecca.makitalo@klgates.com

www.klgates.com

From: Arjun Vasan <arjun.vasan@gmail.com>

Sent: Saturday, December 6, 2025 6:00 PM

To: Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>

Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>; Winningham, Jacob R. <Jacob.Winningham@klgates.com>

Subject: Re: Vasan v. Checkmate - Case No. 2:25-CV-00765-MEMF-AS

I need additional time to review and will circle back with updates by Monday.

Best regards,

Arjun Vasan

On Sat, Dec 6, 2025 at 2:08 PM Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com> wrote:

Mr. Vasan,

I am following up on Mr. Winningham's correspondence and the Draft Stipulated Protective Order circulated to you for review. Please let me know if you have any proposed revisions to the draft so that it can be timely filed.

Thank you,

Rebecca Makitalo

Associate

K&L Gates LLP
10100 Santa Monica Blvd

8th Floor

Los Angeles, CA 90067

Phone: 310 552-5502

Cell: 818 251-6956

rebecca.makitalo@klgates.com

www.klgates.com

From: Winningham, Jacob R. <Jacob.Winningham@klgates.com>

Sent: Saturday, December 6, 2025 8:00 AM

To: Arjun Vasan <arjun.vasan@gmail.com>

Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>

Subject: RE: Vasan v. Checkmate - Case No. 2:25-CV-00765-MEMF-AS

Mr. Vasan,

To clarify: the Stipulated Protective Order (attached here) is entered into and filed by the parties (i.e., Checkmate and yourself) to guide the production of documents. Any third parties who receive or produce documents comply with the terms of the Stipulated Protective Order by reviewing and signing Exhibit A to the Stipulated Protective Order, which is included as the last page of the attached.

Please let us know if we can provide any additional information or clarification regarding the Protective Order. Please let us know if you have any proposed edits or revisions to the attached, and please make any such edits in redline. Thank you.

Best,

Jake Winningham

K&L GATES

Jacob Winningham

Associate

K&L Gates LLP

Phone: 310 552-5042

jacob.winningham@klgates.com

From: Arjun Vasan <arjun.vasan@gmail.com>

Sent: Friday, December 5, 2025 10:20 PM

To: Winningham, Jacob R. <Jacob.Winningham@klgates.com>

Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>

Subject: Re: Vasan v. Checkmate - Case No. 2:25-CV-00765-MEMF-AS

Counsel,

Aren't you supposed to send this to my father? I am confused.

Best,

Arjun Vasan

On Fri, Dec 5, 2025 at 6:24 PM Winningham, Jacob R. <Jacob.Winningham@klgates.com> wrote:

Mr. Vasan,

I am writing to follow up on my earlier correspondence. In the interest of timely complying with the Court's Order, please let us know if you have any proposed edits or changes to the draft Stipulated Protective Order (which is attached to this email). If so, please make any edits or changes in redline in the attached. Thank you.

Best,

Jake Winningham



Jacob Winningham

Associate

K&L Gates LLP

Phone: 310 552-5042

jacob.winningham@klgates.com

From: Winningham, Jacob R.

Sent: Friday, December 5, 2025 1:59 PM

To: Arjun Vasan <arjun.vasan@gmail.com>

Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>

Subject: Vasan v. Checkmate - Case No. 2:25-CV-00765-MEMF-AS

Mr. Vasan,

I hope that this message finds you well. In relation to the above-captioned order and in accordance with Judge Sagar's recent Order (Dkt. 131), please find attached a draft Protective Order containing Checkmate's proposed edits in redline. As per Judge Sagar's standing order, the parties must submit a clean version of the

protective order via ECF and both a clean, as-filed version and a redline comparison version of Judge Sagar's unedited template (both in Word format) to the Chambers email address.

Please let us know if you have any proposed additional revisions to the attached. Please make any additional edits or revisions in redline.

Please provide any proposed revisions today so that we can review and timely file the Protective Order. Thank you.

Best,

Jake Winningham



Jacob Winningham

Associate

K&L Gates LLP
10100 Santa Monica Blvd

8th Floor

Los Angeles, CA 90067

Phone: 310 552-5042

jacob.winningham@klgates.com

www.klgates.com

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at Jacob.Winningham@klgates.com.